

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

STEVEN HEATH,

Plaintiff

CIVIL ACTION NO: 2:13-00386-GZS

v.

**MEGAN BRENNEN,
Postmaster General,
United States Postal Service,**

Defendant

PLAINTIFF'S PROPOSED VOIR DIRE QUESTIONS

1. Do you have any discomfort or hesitation about a lawsuit for personal injuries involving mental pain and suffering?
2. Do any jurors think that there are too many lawsuits for personal injuries?
3. Have any of you ever sat as a juror before? If so, in what kind of case? Do you think that the outcome was fair in that case?
4. Has any member of the jury had unpleasant experiences with lawyers, judges, or the courts? If so, would that experience interfere with your ability to decide this case?
5. Have you had any personal experiences that you believe would prevent you from rendering a fair verdict in this personal injury case?
6. How do you prefer to get your news?
7. Do you subscribe to any magazines? If so, which ones?

8. Have you, your spouse, or any member of your immediate family ever worked in the mental health field? If so, what was the job?
9. Have you, your spouse or any member of your immediate family ever been involved in a law suit? If so, what was the law suit about? What was the result? Do you think that it was a fair result?
10. Do any of you, or any member of your immediate family work or have experience in the legal field or court system? If so, please explain.
11. Have you, your spouse, or any member of your immediate family ever suffered an injury in an accident that was totally disabling for any significant period of time? If so, could you please give us a little information about that injury?
12. This is a civil trial. It is not a criminal trial. The standards of proof in a civil trial such as this one are not as strict as in a criminal case. The person bringing the suit need only prove his or her case by a preponderance of the evidence. The person bringing the suit does not have to prove the claims or his or her damages beyond a reasonable doubt. Does any jury member have any ideas or opinions that would interfere with your ability to apply this lower standard of proof that is required in a civil trial?
13. Do any of you feel that you would have any difficulty in following the Court's instructions on the law?
14. Have you or anyone close to you been involved in attempts to reduce the number of lawsuits or the amount of damages, or given money to any group that try to limit lawsuits?

Respectfully submitted for the Plaintiff,
by his attorney,

/s/ Michael X. Savasuk

Michael X. Savasuk
ME Bar No. 2708
Counsel for Claimant Steven E.
Heath
Troubh Heisler, PA

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CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the within document with the Clerk of the Court using the CM/ECF system which will send notification of such filing(s) to all counsel of record.

/s/ Michael X. Savasuk
Michael X. Savasuk
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511 Congress Street, PO Box 9711
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Dated: October 13, 2015